

EXHIBIT A



Wednesday, June 29, 2005 4:14:34 PM

Message

From: ♀ Jennifer Yelen
♀ ECFnotice@mad.uscourts.gov

To: ♀ Laura Gibbs

Subject: Fwd(2): Activity in Case 1:04-cv-12365-JLT Cognex Corporation v. Caron "Schedulin : Perkins Smi

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<!-- rcsid='\\$Header: /ecf/district/html/TextHead,v 3.1 2003-04-25 07:56:43-04 loy Exp \\$' -->
United States District Court
District of Massachusetts

Notice of Electronic Filing

The following transaction was entered on 5/10/2005 at 10:38 AM EDT and filed on 5/9/2005

#ident 'rcsid=\\$Header: /ecf/district/server/TextBody,v 3.1 2003-04-25 07:52:35-04 loy Exp \\$'
Case Name: Cognex Corporation v. Caron
Case Number: 1:04-cv-12365 <https://ecf.mad.uscourts.gov/cgi-bin/DktRpt.pl?95041>

Document Number: 30

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https://ecf.mad.uscourts.gov/cgi-bin/show_case_doc?30,95041,,267845,

Docket Text:

Judge Joseph L. Tauro : ORDER entered. [22] Motion for Reconsideration is DENIED. [24] Motion to Show Cause and for Order of Civil Contempt is DENIED, as the Superior Court's ex parte Temporary Restraining Order expired. Plaintiff may depose Jean Caron by June 30, 2005. Defendant may file motion for discovery within 30 days after completion of the abovementioned deposition. No additional discovery will be permitted without leave of this court. A Further Conference is scheduled for August 2, 2005 at 10:30 AM in Courtroom 20 before Judge Joseph L. Tauro. Abaid, Kim)

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=5/10/2005] [FileNumber=967973-0]
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<!-- rcsid='\\$Header: /ecf/district/server/TextAtyList,v 3.2 2003-06-02 17:37:56-04 bibeau Exp \\$' -->
1:04-cv-12365 Notice will be electronically mailed to:

Sally L. Adams sadams@seyfarth.com

James E. O'Connell joconnell@pscBoston.com, jdiffee@pscBoston.com

Jennifer A. Yelen JYELEN@PSCBOSTON.com

EXHIBIT B

**PERKINS
SMITH &
COHEN**

FILE

Perkins Smith & Cohen LLP
Attorneys at Law

JENNIFER A. YELEN
617.854.4226
jyelen@pscBoston.com

May 17, 2005

**VIA FACSIMILE TRANSMISSION
AND FIRST CLASS MAIL**

Sally Adams, Esq.
Seyfarth Shaw LLP
Two Seaport Lane, Suite 300
Boston, MA 02210

Re: Cognex Corporation v. Jean Caron
U.S.D.C., Civil Action No. 04-12365-JLT

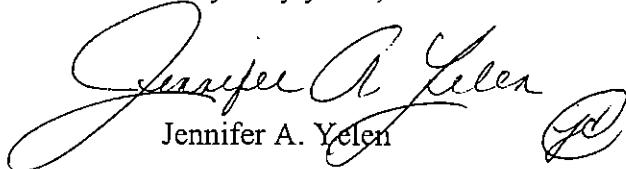
Dear Sally:

Consistent with the Court's Order, we would like to schedule Defendant's deposition. As an initial matter, as much as we'd like a trip to Europe, it would seem to make more sense to bring Mr. Caron here to testify, rather than for all of us to fly there to attend at his deposition. Cognex would pay Mr. Caron's reasonably incurred airfare and accommodation expenses (we would need to work out the details). Assuming that Mr. Caron is agreeable to this arrangement, we would propose conducting his deposition at our offices on Monday or Tuesday, June 20 or 21, commencing at 10:00a.m.

Please advise of your position relative to the location of the deposition and as to your availability on the proposed dates.

Thank you for your attention in this regard.

Very truly yours,



Jennifer A. Yelen

JAY:bmh
13271-11

cc: James E. O'Connell, Jr., Esquire
Chuck Pollak, Esq. (by fax)

EXHIBIT C



World Trade Center East

Two Seaport Lane

Suite 300

Boston, MA 02210-2028

617-946-4800

fax 617-946-4801

www.seyfarth.comWriter's direct phone
(617) 946-4916Writer's e-mail
sadams@seyfarth.com

May 24, 2005

By Facsimile (617-854-4040) and U.S. Mail

Jennifer A. Yelen, Esq.
 Perkins Smith & Cohen LLP
 One Beacon Street, 30th Floor
 Boston, MA 02108

Re: Cognex Corporation v. Caron
 U.S.D.C. Civil Action No. 04-12365-JLT

Dear Jennifer:

I am writing concerning your letter dated May 17, 2005, in which you propose to depose Mr. Caron in Boston on June 20 or 21, 2005, and Cognex will pay for Mr. Caron's reasonably incurred airfare and lodging. I will respond to your proposed dates after we have had the opportunity to confer with our client, but until then I want to respond to your suggestion that the deposition be conducted in Boston. The costs to Mr. Caron are not limited to airfare and lodging, of course, and in light of the position Cognex took in its opposition to Mr. Caron's motion to dismiss on *forum non conveniens* grounds, we propose instead that the deposition be conducted by videoconference. I will look forward to your favorable reply.

Sincerely yours,

SEYFARTH SHAW LLP

A handwritten signature in black ink, appearing to read "Sally L. Adams".

Sally L. Adams

:sp



BRUSSELS

WASHINGTON, D.C.

SAN FRANCISCO SACRAMENTO NEW YORK

LOS ANGELES HOUSTON CHICAGO

ATLANTA BOSTON

EXHIBIT D



Perkins Smith & Cohen LLP
Attorneys at Law
JENNIFER A. YELEN
617.854.4226
jyelen@pscBoston.com

May 26, 2005

**VIA FACSIMILE TRANSMISSION
AND FIRST CLASS MAIL**

Sally Adams, Esq.
Seyfarth Shaw LLP
Two Seaport Lane, Suite 300
Boston, MA 02210

FILE

Re: Cognex Corporation v. Jean Caron
U.S.D.C., Civil Action No. 04-12365-JLT

Dear Sally:

This will acknowledge receipt of your letter dated May 24, 2005. As a preliminary matter, you will note that the position taken by Cognex in its Opposition to your client's Motion relating to videoconferencing was limited to the testimony of non-party witnesses; we did not contemplate or agree in our opposition to conducting your client's deposition by videoconference and we cannot agree to it now. If your client does not agree to be deposed here consistent with the, frankly, generous proposal set forth in our May 17 letter, we are prepared to conduct his deposition in Europe.

We do need to confirm dates as soon as possible, particularly if we are traveling to Europe for the deposition. Please call me or Jim O'Connell as soon as possible to discuss scheduling and related details.

Thank you for your attention in this regard.

Very truly yours,

 A handwritten signature in black ink, appearing to read "JAY".

Jennifer A. Yelen

JAY:bmh
13271-11

cc: James E. O'Connell, Jr., Esquire
Chuck Pollak, Esq. (by fax)

EXHIBIT E

**PERKINS
SMITH &
COHEN**

FILE

Perkins Smith & Cohen LLP
Attorneys at Law

JENNIFER A. YELEN
617.854.4226
jyelen@pscBoston.com

June 14, 2005

Sally Adams, Esq.
Seyfarth Shaw LLP
Two Seaport Lane, Suite 300
Boston, MA 02210

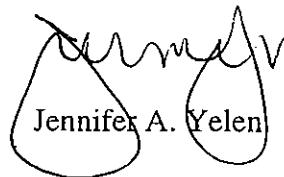
Re: Cognex Corporation v. Jean Caron,
U.S.D.C., Civil Action No. 04-12365-JLT

Dear Sally:

Although we anticipate that the Court may allow your soon-to-be-filed Motion to Withdraw in connection with the above-referenced matter, we do need to keep this process moving in light of the time constraints imposed by the Court. Accordingly, enclosed please find a copy of a Notice of Taking Deposition of Jean Caron.

Thank you for your attention in this regard.

Very truly yours,



Jennifer A. Yelen

JAY/jd
13271-11

Enclosure

cc: James E. O'Connell, Jr., Esquire
Chuck Pollak, Esq. (*w/encl. by mail*)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

COGNEX CORPORATION,)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04 12365 JLT
)	
JEAN CARON,)	
Defendant.)	
)	

To: Sally Adams, Esq.
Seyfarth Shaw LLP
Two Seaport Lane, Suite 300
Boston, MA 02210

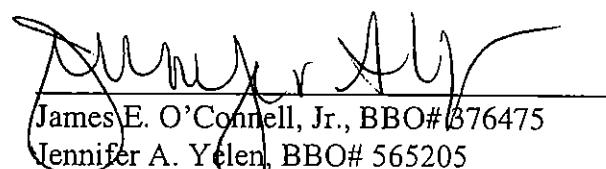
NOTICE OF TAKING DEPOSITION OF DEFENDANT, JEAN CARON

Please take notice that, pursuant to Fed. R. Civ. P. 30, Plaintiff will take the deposition upon oral examination of Defendant, **Jean Caron**, before a notary public or other officer authorized by law to administer an oath, at the offices of Perkins Smith & Cohen LLP, One Beacon Street, 30th Floor, Boston, Massachusetts, commencing at **10:00 a.m. on Tuesday, June 28, 2005**.

The deposition will continue from day to day until completed.

You are invited to attend and cross-examine.

The Plaintiff,
COGNEX CORPORATION,
By its attorneys,

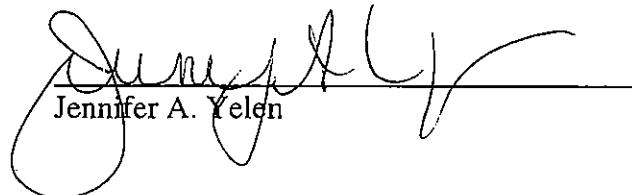


James E. O'Connell, Jr., BBO# 376475
Jennifer A. Yelen, BBO# 565205
PERKINS SMITH & COHEN LLP
One Beacon Street
Boston, MA 02108
(617) 854-4000

Dated: June 14, 2005

CERTIFICATE OF SERVICE

I, Jennifer A. Yelen, counsel for the Plaintiff, hereby certify that on the date first above written, I served a copy of the within Notice of Taking Deposition, by first class mail, postage prepaid, upon counsel of record for the Defendant at her address of record.



Jennifer A. Yelen

A handwritten signature in black ink, appearing to read "Jennifer A. Yelen". Below the signature, the name "Jennifer A. Yelen" is printed in a smaller, sans-serif font.

EXHIBIT F

Perkins Smith & Cohen LLP
Attorneys at LawJENNIFER A. YELEN
617.854.4226
jyelen@pscBoston.com

June 23, 2005

VIA FACSIMILE TRANSMISSION
AND FIRST CLASS MAIL

Sally Adams, Esq.
Seyfarth Shaw LLP
Two Seaport Lane, Suite 300
Boston, MA 02210

Re: Cognex Corporation v. Jean Caron
U.S.D.C., Civil Action No. 04-12365-JLT

Dear Sally:

On June 14, 2005, we served a Notice of Taking Deposition for Defendant, Jean Caron. Please advise if Mr. Caron intends to appear at his deposition on June 28, 2005 at 10:00a.m. at our offices.

Thank you for your attention in this regard.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jennifer A. Yelen".

Jennifer A. Yelen

JAY:bmb
13271-11

cc: James E. O'Connell, Jr., Esquire
Chuck Pollak, Esq. (*via first-class mail*)